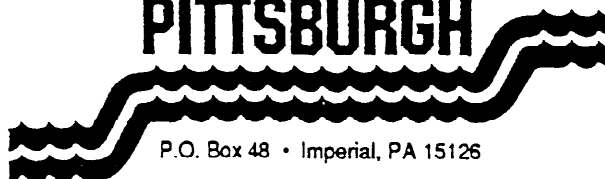


120646

# WATERWAYS ASSOCIATION OF PITTSBURGH



P.O. Box 48 • Imperial, PA 15126

Telephone (724) 695-0269

DEPT OF TRANSPORTATION  
01 JAN 16 PM 4:12

January 12, 2001

Docket Management Facility  
U S Department of Transportation  
Room Pittsburgh Landing --- 401  
400 Seventh Street SW  
Washington DC 20590-0001

Re: Docket # (USCG 2000-6931) -14

Dear Sir or Madam:

We would like to comment on the proposed rule concerning ***Fire-Suppression Systems and Voyage Planning for Towing Vessels***.

The Waterways Association of Pittsburgh (WAP) and the Huntington District Waterways Association (HDWS) are organizations of docks, fleets, harbor service, and towing companies. We both strongly oppose this rule as written.

## **Public Meeting**

COMMENT: It is our understanding this is to be one public meeting in Washington, DC. We would request that there be a public meeting held in Pittsburgh, Pennsylvania and Huntington, West Virginia areas so that western rivers' concerns can be heard.

## **Exempt Vessels**

COMMENT: In the WAP and HDWA there are many member companies that operate harbor tugs. We feel they should be exempt from this rule. The term "*limited geographical area*" needs to be more clearly defined. Many tugs cover 20 or 30 miles to take care of all the fleets, we feel they should be considered running in a limited geographical area.

## **Fixed Fire-Extinguishing Systems**

COMMENT: We feel that all newly constructed vessels should have fixed fire-extinguishing systems on board that meet all current and proposed regulations. We also believe that vessels with fixed fire-extinguishing systems already installed should be grandfathered under this proposed rule.

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### **Voyage Planning**

COMMENT 1: What is the definition of a voyage? Here on the western rivers we are traveling from landing to landing and lock-to-lock. Is each one of these trips a voyage?

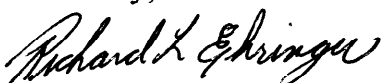
COMMENT 2: Another concern is that in this proposed rule it states that the master of the vessel should prepare the voyage plan and that it would take approximately 30 minutes to prepare. This might work for the towing vessels that work along the coast and are in port; however, out towing vessels on the inland waters are underway most of the time whenever they receive orders for their next trip. We feel that the master of the vessel would not have the time to prepare a voyage plan without violating the USCG 12-hour work rule. We, therefore, ask that western rivers or inland towing vessels be exempt from this proposed rule.

### **Gasoline and Portable Pumps**

COMMENT: It appears from reading this rule that the Coast Guard intends to eliminate gasoline from towing vessels. We strongly oppose this. We have other needs for gasoline other than a portable fire pump and outboard motors. Most vessels have on board five to six portable gasoline pumps that are used for de-watering barges. The cost of these gasoline pumps is \$400.00 per pump, compared to diesel pumps that cost \$1,200.00 per pump. If the towing companies would need to replace all of their gas de-watering pumps with diesel pumps this would cost thousands of dollars per vessel. We, therefore, oppose the elimination of gasoline from towing vessels.

We appreciate the opportunity to make comments on this proposed rule making.

Sincerely,



Richard L. Ehringer  
Waterways Association of Pittsburgh  
Navigation Committee

WAP/HDWA